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STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH

Dedicated to protecting and improving the health and environment of the people of Colorado

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Roy Romer
Governor
Patricia A. Nolan, MD, MPH
Executive Director

November 6, 1992

Mr. Richard J. Schassburger
U. S. Department of Energy
Rocky Flats Office, Bldg 116
P.O. Box 928
Golden, Colorado 80402-0928

RE: Standard Operating Procedure FO.10, DCN 92.07, Change in Drum Inspection Period

Dear Mr. Schassburger,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), has reviewed the above referenced amended document change notice (DCN) submitted by DOE and prime operating contractor, EG&G. The Division suggests changing the wording of the DCN as follows:

The subcontractor is responsible for conducting weekly inspections of all gray drums they have been issued until the drum is returned to EG&G. If, however, the project has been completed, all drum field log forms/waste characterization forms have been turned in and accepted by appropriate EG&G representatives, and the drum was filled outside an IHSS or PAC and will remain at the drill site (i.e. - does not presently need RCRA management), drum inspections will be conducted on a once-a-month basis.

We believe this change more completely clarifies those drums eligible for a decrease in inspection frequency and maintains consistency with the "Gray Drum" handling protocol SOP under development.

If you have any questions regarding these matters, please call Joe Schieffelin of my staff at 692-3356.

Sincerely,

Gary W. Baughman, Chief
Facilities Section
Hazardous Waste Control Program

cc: Martin Hestmark, EPA
Mike Arndt, EG&G
Marcella Broussard, EG&G
Jackie Berardini, CDH-OE

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